

IN THE UNITED STATES ARMY
FIRST JUDICIAL CIRCUIT

UNITED STATES

v.

MANNING, Bradley E., PFC

U.S. Army, (b) (6)

Headquarters and Headquarters Company, U.S.

Army Garrison, Joint Base Myer-Henderson Hall,

Fort Myer, VA 22211

**DEFENSE FORENSIC REQUEST
OF RELEVANT COMPUTERS**

DATED: 26 March 2012

1. The Defense, in consultation with its computer forensic experts, requests the following process be performed in order to facilitate the Court's Order compelling the Government to immediately cause an inspection of 14 hard drives from the Tactical Sensitive Compartmented Information Facility (T-SCIF) and the Tactical Operations Center (TOC) of Headquarters and Headquarters Company (HHC), 2nd Brigade Combat Team (BCT), 10th Mountain Division, Forward Operating Base (FOB) Hammer, Iraq:

a. The Government provides the Court and Defense with a list of the approved programs for the Distributed Common Grounds System Army (DCGS-A) computer;

b. The Government's forensic experts provide the Defense with an EnCase Folder Structure in .rtf format that includes the filenames within each of the following folders for every identified user profile on each hard drive:

(1) Program Files;

(2) User Profile Storage regarding: Documents, Music, Games, Pictures, Local Settings\Application Data etc.;

(3) Windows\Prefetch

2. The requested process will accurately identify any unauthorized music, movies, games, or other programs. The process will not, however, reveal any content of any file. Thus, the information revealed will not be classified, and will not necessitate a review by any Original Classification Authority (OCA).

3. The above process can easily be completed within a matter of a few days. The process will also eliminate the need for the Government to search each computer for every conceivable form of unauthorized media (music, movies, games and other programs). Moreover, this process avoids the Defense having to guess at what, of the millions of software programs out there, might be found on the relevant computers.

4. The point of contact for this memorandum is the undersigned at (b) (6) or by (b) (6)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Coombs', with a long horizontal flourish extending to the right.

DAVID EDWARD COOMBS
Civilian Defense Counsel

30 March 2012

MEMORANDUM FOR RECORD

SUBJECT: Security Expert Review of Defense Motions

1. I hereby certify that I have reviewed the following Defense motions for the presence of classified information:

- a) Defense Request for Search Terms of Relevant Computers; and
- b) Defense Renewal of Motion to Compel Discovery of Computers;

I do not believe that either of these motions contains classified information or information that a reasonable person could believe to be classified.

2. The point of contact for this memorandum is the undersigned at (b) (6)

(b) (6)

IS Division
INSCOM G2

30 March 2012

MEMORANDUM FOR RECORD

SUBJECT: Security Expert Review of Defense Motions

1. I hereby certify that I have reviewed the following Defense motions for the presence of classified information:

- a) Defense Request for Search Terms of Relevant Computers; and
- b) Defense Renewal of Motion to Compel Discovery of Computers;

I do not believe that either of these motions contains classified information or information that a reasonable person could believe to be classified.

2. The point of contact for this memorandum is the undersigned at (b) (6)

(b) (6)

IS Division
INSCOM G2

From: [David Coombs](#)
To: [Lind, Denise R COL MIL USA OTJAG](#)
Cc: ["Kemkes, Matthew J MAJ USARMY \(US\)"; "Bouchard, Paul R CPT USARMY \(US\)"; "Santiago, Melissa S CW2 USARMY \(US\)"; Morrow III, JoDean, CPT USA JFHQ-NCR/MDW SJA; Overgaard, Angel M. CPT USA JFHQ-NCR/MDW SJA; Whyte, Jeffrey H. CPT USA JFHQ-NCR/MDW SJA; Ford, Arthur D. CW2 USA JFHQ-NCR/MDW SJA; \(b\) \(6\) "Prather, Jay R CIV \(US\)"; Williams, Patricia CIV JFHQ-NCR/MDW SJA; Fein, Ashden MAJ USA JFHQ-NCR/MDW SJA](#)
Subject: Search of T-SCIF and TOC Computers
Date: Friday, March 30, 2012 11:05:21 AM
Attachments: [Discovery Renewal - Computers.pdf](#)
[Def. Program List.pdf](#)
[Security Expert Review.pdf](#)

Ma'am,

The Defense has attached the following motions:

- a) Defense Request for Search Terms of Relevant Computers; and
- b) Defense Renewal of Motion to Compel Discovery of Computers.

The Defense has also attached the review of both motions by its security expert (b) (6)

v/r
David

David E. Coombs, Esq.
Law Office of David E. Coombs

(b) (6)

Confidentiality Notice: This transmission, including attachments, may contain confidential attorney client information and is intended for the person(s) or company named. If you are not the intended recipient, please notify the sender and delete all copies. Unauthorized disclosure, copying or use of this information may be unlawful and is prohibited.